

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CONOCOPHILLIPS GULF OF PARIA B.V.,

Plaintiff,

v.

CORPORACIÓN VENEZOLANA DEL
PETRÓLEO, S.A., and PETRÓLEOS DE
VENEZUELA, S.A.,

Defendants.

Case No. 1:22-mc-00264-UNA

DECLARATION OF MARCUS J. GREEN

I, Marcus J. Green, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a lawyer at the law firm of Kobre & Kim LLP, counsel for ConocoPhillips Gulf of Paria B.V. (“ConocoPhillips”) in the above-captioned matter.

2. I make this declaration in support of ConocoPhillips’s Motion for an Order Authorizing the Issuance of a Writ of *Fieri Facias*, dated June 15, 2022 (the “Motion”).

3. I am providing notice of the Motion to Petróleos de Venezuela SA (“PDVSA”) c/o:

a. Samuel T. Hirzel, II, Esq. and Aaron M. Nelson, II, Esq., Heyman Enerio Gattuso & Hirzel LLP, 300 Delaware Avenue, Suite 200, Wilmington, DE 19801, shirzel@hegh.law, anelson@hegh.law.

b. Joseph D. Pizzurro, Esq., Kevin A. Meehan, Esq., Julia B. Mosse, Esq., and Juan O. Perla, Esq., Curtis, Mallet-Prevost, Colt & Mosle LLP, 101 Park Avenue, New York, NY 10178, jpizzurro@curtis.com, kmeehan@curtis.com,

jmosse@curtis.com, jperla@curtis.com.

4. I am providing notice of the Motion to non-party PDV Holding, Inc. (“PDVH”) c/o:

a. Alexandra M. Cumings, Esq. and Kenneth J. Nachbar, Esq., Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, P.O. Box 1347, Wilmington, DE 19899, acumings@mnat.com, knachbar@mnat.com.

b. Nathan P. Eimer, Esq., Eimer Stahl LLP, 224 South Michigan Avenue, Suite 1100, Chicago, IL 60604, neimer@eimerstahl.com.

5. Attached hereto as **Exhibit 1** is ConocoPhillips’ proposed writ of *fieri facias* directed to PDVH.

6. Attached hereto as **Exhibit 2** is ConocoPhillips’ proposed *praecipe* in support of its request that the Clerk of the Court issue the writ of *fieri facias*.

7. Attached hereto as **Exhibit 3** is a true and correct copy of the judgment entered against the Defendants and in favor of ConocoPhillips by the District Court for the Southern District of New York, dated December 3, 2020 (the “SDNY Judgment”).

8. Attached hereto as **Exhibit 4** is a true and correct copy of PDVH’s Corporate Disclosure Statement, as filed in *Crystallex Int’l Corp. v. Bolivarian Republic of Venezuela et al.*, C.A. No. 22-1606 (3d Cir., Apr. 21, 2022), D.I. 36, dated April 21, 2022.

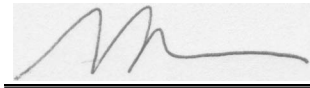
9. Attached hereto as **Exhibit 5** is a true and correct copy of the Stipulation restraining ConocoPhillips from seeking enforcement of the judgment for a period of 18 months following entry of the judgment, dated December 3, 2020.

10. Attached hereto as **Exhibit 6** is a true and correct copy of the PDVSA’s Guarantee of Proper Performance under Annex G-2 at 7, originally attached as Exhibit D of

Plaintiff's S.D.N.Y. Petition for Recognition.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 15, 2022 in New York, New York.

A handwritten signature in black ink, appearing to read 'M. Green', is written over a horizontal line.

Marcus J. Green